

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,

- *against* -

NATIONAL SETTLEMENT AGENCY, INC.,  
STEVEN M. LEFF, RACHEL M. LEFF, AND  
RICHARD A. LEFF.

Defendants.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:

DATE FILED: OCT 09 2007

Case No. 07-CIV-7657 (LTS)

*✓* PROPOSED SUPPLEMENTAL  
DISCLOSURE ORDER  
AS AGAINST DEFENDANT  
RACHEL M. LEFF

Upon the Order to Show Cause of Plaintiff ABN AMRO Mortgage Group Inc. ("AAMG") dated September 27, 2007, the Declaration of David N. Kelley dated September 26, 2007, and the exhibits attached thereto, and the Memorandum of Law in support of this Order to Show cause dated September 26, 2007, and due deliberation being had thereon;

And the Court by the Honorable Laura Taylor Swain, United States District Judge for the Southern District of New York, having entered an Order of Attachment, Preliminary Injunction, and Order Allowing Expedited Discovery (the "Order of Attachment") against Defendant Rachel M. Leff dated September 10, 2007 ordering that

on or before September 21, 2007, Defendant Rachel M. Leff shall provide counsel to Plaintiff a sworn affidavit (1) enumerating in detail all of Defendant Rachel M. Leff's assets, including each and every bank account, investment interest, investment account, investment, commercial paper, parcel of property, motor vehicle, watercraft, or other personal property of \$10,000 of value or more, whether held personally or in trust, and the location and garnishee of each and (2) listing all

persons, including accountants and financial advisors, with personal knowledge of any Defendant's assets and finances,

the affidavit described above being known hereinafter as the "Affidavit of Assets";

And Plaintiff having filed an Amended Complaint on September 14, 2007, and having filed the Order to Show Cause on September 27, 2007 requiring Defendant Rachel M. Leff to show cause why an order should not issue:

- (a) holding Defendant Rachel M. Leff in civil contempt of this Court's September 10, 2007 Order Of Attachment, Preliminary Injunction, and Order Allowing Expedited Discovery as against Defendant Rachel M. Leff;
- (b) ordering that Defendant Rachel M. Leff shall, until judgment is rendered in this case or this order is revoked, provide to Plaintiff's counsel on or before the tenth day of each calendar month an account of her income and expenses and transfers of any kind for the prior calendar month, including any income, expenses, transfers of assets or gifts-in-kind of \$50 or greater value. Income or expenses or transfers from or to any given person on any given day shall be aggregated for the purposes of determining whether they constitute one or multiple items. Each statement shall be signed by Defendant Rachel M. Leff and notarized; and
- (c) ordering that Defendant Rachel M. Leff shall provide to Plaintiff's counsel on or before \_\_\_\_\_, 2007
- all bank account and credit card statements from February 2007 to the present for cards that she used and/or accounts on which she had any signing authority from February 2007 to the present;
  - all income, expenditures and transfers, including in-kind transfers, of value in excess of \$1000, made from February 2007 to the present. Income or expenses or transfers for any given calendar week (Sunday to Saturday) shall be aggregated for the purposes of determining whether they constitute one or many transfers;

And Plaintiff AAMG having withdrawn its motion that Defendant Rachel M. Leff be held in contempt;

✓ And Plaintiff AAMG and Defendants Rachel Leff, Steven Leff, and Richard Leff having appeared before this Court on October 9, 2007; it is

ORDERED that, pursuant to Fed. R. Civ. P. 64 and C.P.L.R. § 6220 and the Court's inherent authority to remedy past violations of its orders, Defendant Rachel M. Leff shall, until judgment is rendered in this case or this order is revoked, provide to Plaintiff's counsel on or before the tenth day of each calendar month an account of her income and expenses and transfers of any kind for the prior calendar month, including any income, expenses, transfers of

\$250 assets or gifts-in-kind of ~~\$50~~ or greater value. Income or expenses or transfers from or to any given person on any given day shall be aggregated for the purposes of determining whether they constitute one or multiple items. Each statement shall be signed by Defendant Rachel M. Leff and notarized; and it is further

ORDERED that Defendant Rachel M. Leff shall provide to Plaintiff's counsel on

or before October 23, 2007

- all bank account and credit card statements from February 2007 to the present for cards that she used and/or accounts on which she had any signing authority from February 2007 to the present,
- all income, expenditures and transfers, including in-kind transfers, of value in excess of \$1000, made from February 2007 to the present. Income or expenses or transfers for any given calendar week (Sunday to Saturday) shall be aggregated for the purposes of determining whether they constitute one or many transfers.

Dated: New York, New York  
October 9, 2007

  
United States District Judge